

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RAYMOND BALESTRA, *individually*
and on behalf of all others similarly
situated,

Plaintiff,

v.

ATBCOIN LLC, EDWARD NG, and
HERBERT HOOVER,

Defendants.

17-cv-10001

STATEMENT OF DAMAGES

Pursuant to Electronic Case Filing Rules & Instructions 16.2, Lead Plaintiff now submits this Statement of Damages in connection with the Motion for Default Judgment. Specifically, Lead Plaintiff seeks to hold Defendants ATBCoin LLC, Edward Ng, and Herbert Hoover jointly and severally liable for \$20,400,000.00 in damages under Section 12(a) of the Securities Act of 1933 with both (i) pre-judgment interest per 28 U.S. Section 1961 at a rate of _____ % per annum, computed from the date of the ATBCoin ICO—September 15, 2017—until the date of the Final Judgment and (ii) post-judgment interest at the rate of _____ % per annum, computed daily from the date of this Order to the date of payment and compounded annually.

DATED: November 2, 2022

Respectfully submitted,

/s/ Donald J. Enright

Donald J. Enright (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2022, I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using CM/ECF, and thereby served upon all counsel so registered. Additionally, a PDF copy of the foregoing will be served by email on defendants Ng and Hoover today.

/s/ Donald J. Enright

Donald J. Enright